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Counsel to General Electric International, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE WATTSTOCK, LLC,

Debtor.

WATTSTOCK LLC,

Plaintiff,

v.

ALTA POWER LLC,

Defendant, Counter-Plaintiff, and Third-Party Plaintiff,

v.

WATTSTOCK LLC,

Counter-Defendant, and

**GENERAL ELECTRIC
INTERNATIONAL, INC., d/b/a GE**

Case No. 21-31488-sgj11V

**Chapter 11
Subchapter V**

Adv. No. 21-03083-sgj

***Removed from the District Court of
Dallas County, Texas, 116th Judicial
District***

Case No. DC-20-08331

POWER SERVICES,

Third-Party Defendant.

**GENERAL ELECTRIC INTERNATIONAL, INC.'S RULE 12(C)
MOTION FOR JUDGMENT ON THE PLEADINGS**

Third-Party Defendant General Electric International, Inc. ("GE") hereby respectfully moves the Court to enter judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c) and dismiss with prejudice each of the claims alleged in Defendant and Third-Party Plaintiff Alta Power, LLC's Third-Party Petition against GE. The grounds for this motion are fully set forth in the accompanying opening brief, filed concurrently.

Nothing contained in this motion or in the brief filed in support of this motion shall be construed as (i) a consent by GE to the jurisdiction of the Bankruptcy Court to finally adjudicate the claims asserted against GE in this proceeding; (ii) a waiver or release of the right to move to withdraw the reference of this proceeding; (iii) a waiver or release of the right to have final orders entered only after de novo review by a United States District Judge; or (iv) a waiver or release of any right to trial by a jury.

Dated: February 28, 2022

Respectfully submitted,

/s/ Eric T. Haitz

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COUNSEL TO GENERAL ELECTRIC
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Eric T. Haitz

Eric T. Haitz

*Attorney for General Electric
International, Inc.*